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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36**

FEB 04 2016

Annual 64.2009(e) CPNI Certification for 2016 covering the prior calendar year 2015. **FCC Mailroom**

Date filed: January 20, 2016

NAME OF COMPANY COVERED BY THIS CERTIFICATION: NETWORK OPERATOR SERVICES, INC.

Form 499 Filer ID: 802524 (has been cancelled)

DOCKET FILE COPY ORIGINAL

Name of signatory: Linda Martin

Title of signatory: Secretary

I, Linda Martin, certify that I am an officer of Network Operator Services, Inc. "NOS", and acting as an agent of NOS, that I have personal knowledge that NOS has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how NOS' procedures ensure that it is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

NOS affirms that it has not taken any actions against data brokers in the past year nor have any pretexters attempted to access CPNI.

NOS affirms that it has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47.C.F.R. § 1.17 which required truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action

Signed



Linda Martin

Secretary

Network Operator Services, Inc.

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**STATEMENT OF COMPLIANCE
WITH CPNI RULES**

FCC Mail Room

Network Operator Services, (the "Company") provides operator services and live agent solutions to local exchange companies, interexchange companies, hospitality customers and payphone customers.

The Company has elected to utilize or provide CPNI only for purposes that are permissible without customer approval in accordance with 47 C.F.R. § 64.2005. Accordingly, the Company currently does not use CPNI in a manner that requires customer approval and is not required to implement a system by which the status of a customer's CPNI approval can be established prior to the use of CPNI. Therefore, as permitted by the CPNI rules, the Company may use CPNI (1) to bill and collect for services rendered; (2) to protect rights or property of the Company, other users or other carriers from unlawful use. The Company does not share, sell, lease and otherwise provide CPNI to any unrelated third parties for the purposes of marketing any services.

The Company has implemented processes and procedures to train its personnel as to when they are and are not permitted to use CPNI. For instance, all Company employees are required to abide by the Company's CPNI Manual, which, inter alia, requires employees to maintain the confidentiality of all information, including CPNI, that is obtained as result of their employment by the Company. The Company's CPNI Manual also provides a comprehensive roadmap of how Company employees are required to use, maintain and disclose CPNI. Employees who violate the Company's CPNI Manual will be subject to discipline, including possible termination.

The Company does not currently engage in any large-scale coordinated sales and marketing campaigns. The Company does some limited marketing of new services to existing customers on a case-by-case basis. Records of these customer contacts are maintained in Company databases. Specifically, the Company utilizes an account management and trouble ticketing system that documents contacts with customers. These records are maintained for at least one year.

The Company ensures that it does not provide CPNI to any customer on an inbound call without proper customer authentication. The Company does not use, maintain or otherwise collection call detail information from its customers. The Company does not provide online account access for its customers.

Since the Company does not have passwords or back-up secret questions for lost or forgotten passwords and does not offer online account access, the Company is not required to notify customers of changes to these items. In the event of a breach of CPNI that is maintained by the Company, it will provide law enforcement with notice of such CPNI breach. After notifying law enforcement and unless directed otherwise, the Company will notify affected customers and will maintain a record of any CPNI-related breaches for a period of at least two years as required by the applicable FCC CPNI rules.

In the event the Company changes its marketing practices to provide an opt-out to customers, it will implement procedures to ensure that it will provide written notice to the FCC within five business days of any instance where the opt-out mechanisms do not work properly in accordance with 47 C.F.R. 64.2009(f).